

INTERVENTION
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2 ARIZONA CENTER FOR LAW RECEIVED
3 IN THE PUBLIC INTEREST

4 202 E. McDowell Rd., Suite 153 2008 JUN 13 A 10: 25
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AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

JUN 13 2008

5 Attorneys for Western Resource Advocates and
6 Southwest Energy Efficiency Project

DOCKETED BY

7
8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 MIKE GLEASON, CHARIMAN
10 WILLIAM A. MUNDELL
11 JEFF HATCH-MILLER
12 KRISTIN K. MAYES
13 GARY PIERCE

14 IN THE MATTER OF THE APPLICATION
15 OF ARIZONA PUBLIC SERVICE
16 COMPANY FOR A HEARING TO
17 DETERMINE THE FAIR VALUE OF THE
18 UTILITY PROPERTY OF THE COMPANY
19 FOR RATEMAKING PURPOSES, TO FIX A
20 JUST AND REASONABLE RATE OF
21 RETURN THEREON, TO APPROVE RATE
22 SCHEDULES DESIGNED TO DEVELOP
23 SUCH RETURN

Docket No. E-01345A-08-0172

**PETITION FOR LEAVE TO
INTERVENE OF WESTERN
RESOURCE ADVOCATES AND
SOUTHWEST ENERGY
EFFICIENCY PROJECT**

24 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation
25 Commission ("Commission"), Western Resource Advocates ("WRA") and Southwest
Energy Efficiency Project ("SWEEP") (collectively, "WRA/SWEEP") hereby petition
for leave to intervene in the above-captioned docket and, in support thereof, state as
follows:

Western Resource Advocates

1. WRA is a regional environmental law and policy center serving the Rocky Mountain and Desert Southwest states. WRA has been involved in proceedings before the Commission for over twelve years and has been granted intervenor status in numerous dockets. As part of this work, WRA has represented a number of other Arizona non-profit organizations on energy issues. WRA has a board member, a staff member and members and supporters who live and recreate in Arizona and/or are Arizona Public Service Company ("APS") electric ratepayers.

2. WRA's Energy Project promotes policies and programs designed to encourage the development of clean energy power production technologies, energy efficiency, renewable resources, distributed generation, and other measures that help reduce the environmental impacts of meeting the demand for energy services and encourage sustainable rural economic development, while minimizing the costs and risks to ratepayers of fuel price volatility and environmental regulatory requirements. It has appeared in rate proceedings before the Commission and in other state and federal regulatory forums to recommend, among other things, improvements in rate design for sending efficient price signals and cost recovery mechanisms for investments in renewable energy and energy efficiency.

Southwest Energy Efficiency Project

3. SWEEP is a non-profit public interest organization promoting greater energy efficiency in six states in the Southwest including Arizona. SWEEP seeks to promote the development of energy efficiency programs, rate design reform, distributed

1 generation resources and other measures that result in the more efficient utilization of
2 electric energy resources. SWEEP has participated in prior Commission proceedings and
3 has staff located in Arizona.

4 4. SWEEP has a substantial interest in this proceeding because APS' proposed
5 rate increase and its proposed treatment of costs associated with the provision of electric
6 energy supplies in this case can significantly influence ratepayer incentives for the
7 efficient use of electricity resources and the overall costs to ratepayers of electric energy
8 services.
9

10 Intervention by WRA/SWEEP will not unduly broaden the issues or delay the
11 proceeding. WRA/SWEEP does not yet know what position it will take in this
12 proceeding.
13

14 5. WRA/SWEEP request that all pleadings, correspondence, discovery, and
15 other documents be served on the following:

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17 Arizona Center for Law in the Public Interest
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19 Phoenix, AZ 85004
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21 David Berry
22 Western Resource Advocates
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24 Scottsdale, Arizona 85252-1064
25 (480) 990-7209 (fax is the same)
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1 Jeff Schlegel
2 SWEEP Arizona Representative
3 1167 W. Samalayuca Dr.
4 Tucson, AZ 85704-3224
5 (520) 797-4392
6 FAX: (520) 797-4393
7 schlegelj@aol.com

8 WHEREFORE, WRA/SWEEP respectfully request that the Commission issue an
9 order granting their Petition for Leave to Intervene in the above-captioned proceeding.

10 DATED this 13th day of June, 2008.

11 ARIZONA CENTER FOR LAW IN
12 THE PUBLIC INTEREST

13 By 

14 Timothy M. Hogan
15 202 E. McDowell Rd., Suite 153
16 Phoenix, Arizona 85004
17 Attorneys for Western Resource
18 Advocates and Southwest Energy Efficiency
19 Project

20 ORIGINAL and 13 COPIES of
21 the foregoing filed this 13th day
22 of June, 2008, with:

23 Docket Control
24 Arizona Corporation Commission
25 1200 W. Washington
Phoenix, AZ 85007

COPIES of the foregoing
electronically transmitted
this 13th day of June, 2008
to:

All Parties of Record
